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December 14, 2006

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RONALD AUSTIN CANTY  
1963-2004

## VIA TELEFAX (205) 678-0000

Kate Hortberg  
Boardman, Carr, Weed & Hutcheson, P.C.  
400 Boardman Drive  
Chelsea, Alabama 35043-8211

**RE: A.G., et al. v. Autauga County Board of Education**

Dear Kate:

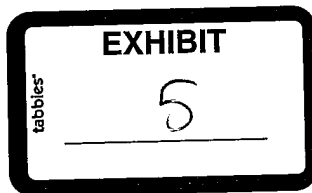
I am in receipt of your faxed letter dated December 13, 2006.

I have enclosed a sample of a search done on my computer, which lists the document number and the date the document was modified.

Because of the type of software my firm uses, each document is assigned a number instead of a title or name. Also, with the search results/index, I would like to also know the date that the document was created, which can be shown on a printout, but is not shown on this printout.

Further, even though I mentioned that for now we would only like to see an index of the files on the computers listed in the discovery. I have not ruled out the fact of requesting the computers if the need arises.

With respect to the *Ford Motor Company* case, which you have cited, it is my understanding from reading the case that the *mandamus* was granted because the trial court gave the Plaintiffs access to two of the Ford Motor Company databases. That ruling is easily distinguishable from the request that Rick and I have made in this case. Therefore, I believe that opinion does not stand for the proposition that the Plaintiffs are not entitled to certain electronic data.



Kate Hortberg Fax  
December 14, 2006  
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Please let me know your response.

My best regards,

BEASLEY, ALLEN, CROW,  
METHVIN, PORTIS & MILES, P.C.

MICHAEL J. CROW

MJC/anc

Enclosure

CC: Rick Drummond **VIA TELEFAX (251) 650-1264**

## Search Results

File Edit View Favorites Tools Help

Back Search Folders

Address Search Results

## Other Places

Desktop

My Computer

My Documents

My Network Places

## Details

Search Results

System Folder

| Name        | In Folder              | Size  | Date Modified       |
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| 1218182.doc | \\mike-crow\c\$\Shadow | 29 KB | 11/8/2004 9:19 AM   |
| 1279301.doc | \\mike-crow\c\$\Shadow | 21 KB | 3/16/2006 1:58 PM   |
| 128151.doc  | \\mike-crow\c\$\Shadow | 30 KB | 12/27/2004 11:18 AM |
| 128333.doc  | \\mike-crow\c\$\Shadow | 23 KB | 5/24/2006 9:46 AM   |
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